

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: U LOCK INC., Debtor.	Bankruptcy No. 22-20823-GLT Chapter 7
GEORGE SNYDER, Movant, v. CHRISTINE BIROS, Respondent.	Related Doc. Nos.: 509, 513 & 517 Hearing Date: March 28, 2024 @1:30pm Response Deadline: January 22, 2024

**LIMITED RESPONSE AND RESERVATION OF RIGHTS
OF CREDITOR CHRISTINE BIROS RELATED TO
OBJECTIONS TO CLAIMS FILED BY GEORGE SNYDER**

For her response to the *Objection to Claim # 2* [Doc. No. 509], *Objection to Claim # 3* [Doc. No. 513], and *Objection to Claim # 4* [Doc. No. 517] (the “Objections”) filed by George Snyder (“Movant”), Christine Biros (“Respondent”) states as follows:

A. The Objection to Claim No. 2 is Moot and Should be Denied

1. Claim No. 2 was for payment of real estate taxes that were the responsibility of the U Lock, Inc. (the “Debtor”) and the Bankruptcy Estate (the “Estate”). Those taxes were paid to the taxing authority by Robert H. Slone, Chapter 7 Trustee for the Estate (the “Trustee”).

2. Accordingly, with the resolution of Claim No. 2, the Objection to Claim No. 2 is moot and should be denied with prejudice.

B. In Light of Limited Resources Available for Distributions to Unsecured Creditor Claims, Claim Nos. 3 and 4 are Unlikely to be Paid

3. It is abundantly clear that there will be no distribution to general unsecured creditors. Claims No. 3 and No. 4 are general unsecured claims. Considering the present state of the case, Respondent does not believe that the Respondent, the Movant, the Trustee, or the Court should expend further resources on the Objection proceedings related to these claims.

RESERVATION OF RIGHTS

4. Respondent reserves all rights to respond in the future to any objection on any grounds in the event that Respondent files amended proofs of claims. If the Trustee discovers assets which could lead to a distribution for general unsecured creditors, Respondent shall be permitted to amend and defend Claim Nos. 3 & 4 and have them considered timely filed and subject to further objections pursuant to applicable law.

WHEREFORE, the Respondent respectfully requests that this Court (i) deny the objections to Claims No. 2, 3, and 4 as MOOT, and (ii) grant such other and further relief as is just and proper.

Dated: January 22, 2024

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/ Robert S. Bernstein

Robert S. Bernstein (PA ID No. 34308)
601 Grant Street, Floor 9
Pittsburgh, PA 15219
Telephone: (412) 456-8108
Facsimile: (412) 456-8135
rbernstein@bernsteinlaw.com